## REMARKS

Claims 1, 2, 7-9 and 14 are pending. In the March 28, 2005 Office Action, the Examiner:

1. Objected to the drawings;
2. Rejected claims 1 and 8 as anticipated under 35 U.S.C. § 102(e) as being anticipated by U.S. PG-PUB 2003/0133035 to Hatano;
3. Rejected claims 2, 7, 9, and 14 as obvious under 35 U.S.C. § 103(a) over Hatano in view of U.S. Patent No. 5,905,527 to Inou.

Applicants respectfully traverse.

Applicants have amended the drawings as requested by the Examiner. The Examiner's objections to the drawings are now moot. Applicants have also amended claims 1 and 2 to more particularly point out and distinctly claim what they regard as their invention. Applicants respectfully submit that the amendment to claim 1 renders the Examiner's rejection under 35 U.S.C. § 102(e) moot as claim 1 was amended to incorporate a limitation from claim 2. The Examiner admits that "Hatano does not disclose ... the limitations of claim 2." With respect to the Examiner's rejections under 35 U.S.C. § 103(a), Applicants respectfully submit that the Examiner has not made a prima facie case of obviousness.

Applicants respectfully submit that one of ordinary skill in the art would not have been motivated to combine Hatano and Inou to arrive at the claimed invention. The Examiner states that "Inou discloses calculating a misregistration amount between two subsequent frames through a calculation of motion vectors." However, Inou does not capture "a plurality of images with different amounts of exposure" as recited in claim 1. Inou does not calculate misregistration amounts or anything between respective images. No matter what calculations are disclosed in Inou, the Examiner has not pointed to any teaching in either reference that shows that one of ordinary skill in the art would have been motivated to use the calculations disclosed by Inou in Hatano.

The Examiner explains that Inou "discloses to utilize the band pass filter to remove outliers that would make the amount of movement calculated to be detected incorrectly (sic) and further that binary coding the image and passing it through the band pass filter also reduces the amount of data to be processed and eliminates influences of a change in illumination intensity." However, the Examiner fails to point to any teaching in either

reference that would motivate one of ordinary skill in the art to apply the utilization of the band pass filter and the binary coding to "a plurality of images." Inou only teaches using one image.

Therefore, one of ordinary skill in the art would not have been motivated to combine Hatano with Inou to arrive at the claimed invention. The Examiner has therefore failed to make a prima facie case of obviousness.

Applicants respectfully submit that claims 1, 2, 7, 8, 9 and 14 are in condition for allowance. Favorable reconsideration is respectfully requested.

Respectfully submitted,

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## IN THE DRAWINGS

The amended replacement sheets of drawings in the attached Appendix include changes to the drawings as follows:

Replacement sheet 1/2 includes Figures 1 and 30, which replaces the original sheet including Figures 1 and 30. Replacement sheet 1/2 has the previously omitted "RELATED ART" label added to Figure 30.

Replacement sheet 2/2 includes Figures 3A, 3B, and 3C, which replaces the original sheet including Figures 3A, 3B, and 3C. Replacement sheet 2/2 has the previously omitted "RELATED ART" label added to Figures 3A, 3B, and 3C.